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 Facebook, Inc.; Facebook Holdings, LLC;
 Facebook Operations, LLC; Facebook Payments,
 Inc.; Facebook Technologies, LLC; Instagram,
 LLC; and Siculus, Inc.*

**UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
 ADDICTION/PERSONAL INJURY PRODUCTS
 LIABILITY LITIGATION

THIS FILING RELATES TO:

 ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

Honorable Yvonne Gonzalez Rogers

DECLARATION OF RACHANY T. SON

1 I, Rachany T. Son, declare:

2 1. I am a Director & Associate General Counsel for Meta Platforms, Inc. ("Meta"). Prior to
3 this role, I served in several in-house counsel roles for Meta, including as Lead Counsel and Associate
4 General Counsel, from August 2019 through the present. I base this declaration upon my personal
5 knowledge and could and would testify to the following facts if called to do so.

6 2. In and around the spring of 2022, certain regulations affecting "youth" (i.e., users under
7 the age of 18) were being enacted or contemplated in foreign and domestic jurisdictions, including the
8 European Union, the State of California, and others. These new and evolving regulations presented a
9 substantial legal issue for Meta, given the complexity of its services, its global scope and the need to craft
10 legal compliance policies in the youth space that accounted for this rapidly developing legal landscape.

11 3. In my capacity as in-house counsel for Meta, one of my principal responsibilities was to
12 provide legal counsel to the company on these statutory and regulatory requirements. Accordingly, I
13 endeavored to review these existing and potential regulations and understand Meta's potential regulatory
14 and enforcement risks. I and members of Meta's in-house counsel planned to summarize these findings
15 in what we called a Youth "State of the Union" to present to senior leadership.

16 4. As part of this exercise, I engaged with Meta's outside counsel at the law firm White &
17 Case LLP ("White & Case") for legal advice on these regulations, including how they may apply to Meta
18 and how Meta could mitigate risk. Among the services we analyzed were Meta's Facebook, Instagram,
19 Messenger, and others. As part of this analysis, I also asked White & Case to assess our regulatory risk
20 in the context of other social media companies, e.g., Meta's competitors.

21 5. In my capacity as in-house counsel for Meta, I was involved in the creation, drafting, and
22 editing of certain slide decks produced as follows:

Original Bates	Re-produced with Redactions
META3047MDL-035-00002871	META3047MDL-085-00000104
META3047MDL-035-00004050	META3047MDL-085-00000271
META3047MDL-073-00001477	META3047MDL-085-00000211

26 6. These slide decks were created as part of Meta's Youth "State of the Union" discussed
27 above. I personally drafted portions of these slide decks, working with a small team of Meta employees
28

1 to refine the presentation. Periodically throughout this process, I requested review by attorneys at White
2 & Case of our efforts, and some of the slides contain charts and analysis that I recall White & Case having
3 originally prepared.

4 7. Given the nature of this exercise, we drew upon the expertise and knowledge of a number
5 of company personnel, including Miki Rothschild, but I remained intimately involved throughout the
6 course of this project. We worked closely with the relevant Meta personnel to understand and evaluate
7 the current state of Meta's services across these jurisdictions and what changes or adjustments to a wide
8 swath of Meta's services this evolving legal landscape might require. When we engaged with non-attorney
9 company personnel, it was for the primary purpose of providing legal analysis of Meta's potential
10 regulatory risks.

11 8. The complexity of this project was substantial, but from the beginning it was fundamentally
12 an assessment of the legal regulatory and compliance risks with Meta's services. The slide decks I worked
13 on were prepared with input from other departments within Meta, but the legal department led the effort,
14 and consideration of legal and regulatory risks was a core component of the presentations.

15 9. I have reviewed the documents at issue in their original and redacted versions and confirm
16 that they reflect and extensively integrate the legal advice provided by Meta's outside counsel at White &
17 Case. Specifically, the slide decks contain an assessment of existing and predicted future regulations
18 addressing Youth use of social media apps and their application to Meta and other companies' platforms.

19 10. Although created as three different documents, the redactions in the slide decks produced
20 at the Bates numbers identified above all reflect the same legal advice provided by White & Case.

21 11. From my perspective, the primary purpose of the slide decks was to communicate legal
22 advice within Meta. Neither the slide decks, nor the overall Youth State of the Union, had primarily
23 "business" purposes, such as generating additional revenue, growing market share, or other goals that
24 might be described as "business" endeavors. Rather, as explained above, they combined an assessment
25 of the state of Meta's provision of its services to youth users, to provide legal advice to the company
26 regarding Meta's existing and potential regulatory risks in the youth area, and to suggest a range of
27 strategies that could potentially mitigate those risks.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 24, 2024 at Milan, Italy.

Rachany Son

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Rachany T. Son